

## **REMARKS/ARGUMENTS**

The Applicants originally submitted Claims 1-21 in the application. In previous responses, the Applicants amended Claims 1-7, 12 and 17. In the present response, the Applicants have amended Claims 1 and 3-6. No claims have been canceled or added. Accordingly, Claims 1-21 are currently pending in the application.

### **I. Rejection of Claims 1-6 under 35 U.S.C. §102**

The Examiner has rejected Claims 1-6 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,363,319 to Hsu. The Applicants respectfully disagree since Hsu does not teach selecting at least a subset of candidate OSPF aggregates to advertise by an area border router such that a path length between a particular source and destination subnets selected from advertisement of weights corresponding to the subset approaches a shortest path length between a particular source and destination subnets irrespective of the weights advertised as recited in independent Claims 1, 3 and 5.

Hsu is directed to selecting a route for a flow of data from a plurality of network paths. (*See* column 1, lines 42-43 of Hsu.) Hsu teaches selecting a route in computer communication networks by determining cumulative costs of candidate paths using a biased cost function and selecting an optimal path based on a minimum cumulative costs. (*See* column 2, lines 50-54.) Hsu introduces a cost bias to the advertised static OSPF cost metric that allows leaving the advertised cost in place and considers characteristics of the flow to be placed. (*See* column 5, lines 43-46 and column 6, lines 29-44.) Hsu replaces the advertised cost with a biased cost and selects the path with the minimum cumulative biased cost. (*See* column 6, lines 56-67.)

Hsu, therefore, is concerned with the costs that are advertised at a router but does not address selecting which OSPF aggregates to advertise by an area border router. As discussed in the present application, selection of aggregates to advertise differs from assigning weights to each aggregate that is advertised. (See for example, paragraphs 35-38 of the present application.) The Applicants do not find any teaching by Hsu directed to intelligently selecting which OSPF aggregates to advertise by an area border router. Hsu merely discloses that an area router is used for advertising information (*i.e.*, costs) about a network to a system backbone and concentrates on determining a cost to advertise. (See column 4, lines 7-10 and column 2, lines 54-57.)

Thus, even though Hsu may teach advertising OSPF costs at area routers, Hsu does not teach selecting which OSPF aggregates to advertise by an area border router. Additionally, Hsu teaches selecting a path based on an advertised cost instead of selecting at least a subset of candidate OSPF aggregates such that a path length between a particular source and destination subnets selected from advertisement of weights corresponding to the subset approaches a shortest path length between the particular source and destination subnets **irrespective of the weight advertised** as recited in Claims 1, 3 and 5.

Accordingly, Hsu does not teach each and every element of independent Claims 1, 3 and 5. Thus, Hsu does not anticipate Claims 1, 3 and 5 and Claims dependent thereon. The Applicants, therefore, respectfully request the Examiner to withdraw the §102(b) rejection of Claims 1-6 and allow issuance thereof.

Furthermore, the Applicants do not find where Hsu teaches computing a lower bound of error for the candidate OSPF aggregates employing a set of recursive equations as recited in amended Claim 4. The Applicants also do not find where Hsu teaches the candidate OSPF aggregates are

represented by trees and the aggregate selector selects subsets of each of the trees to reduce an error thereof and combines the subsets to yield the subset to reduce an error associated with the trees as recited in amended Claim 6. As discussed above, the Applicants do not find where Hsu even addresses intelligently selecting which OSPF aggregates to advertise. Support for these amended claims can be found in paragraphs 57-58 of the original specification.

## **II. Rejection of Claims 7-21 under 35 U.S.C. §103**

The Examiner has rejected Claims 7-21 under 35 U.S.C. §103(a) as being unpatentable over Hsu in view of U.S. Patent No. 6,256,675 to Rabinovich. The Applicants respectfully disagree.

As recognized by the Examiner, Hsu does not teach a weight assigner that assigns weights to OSPF aggregates based on an average distance of subnets in an area to a particular area border router (ABR) of the area as recited in Claims 7, 12 and 17. To teach averaging distances of subnets in an area, the Examiner cites Rabinovich. (*See* Examiner's Action, page 3 and 9.) Averaging distances of subnets in an area differs, however, from averaging distances of subnets in an area **to a particular ABR** of the area as presently claimed. The Applicants do not find where Rabinovich teaches or suggests averaging distances of subnets in an area to a particular ABR of the area as recited in Claims 7, 12 and 17. Instead, the sections cited by the Examiner teaches maintaining the distances from a source to a geographical entity averaged over requests for objects kept by the geographical entity (*see* column 14, lines 20-23), and the OSPF cost of delivering a message (*see* column 20, lines 6-9). Since Rabinovich does not teach or suggest averaging distances of subnets in an area to a particular ABR of the area as recited in independent Claims 7, 12 and 17, Rabinovich does not cure the noted deficiency of Hsu.

Additionally, Rabinovich teaches advertising cost metrics for sending messages to all links within an area. (See column 19, lines 35-53.) Thus, Rabinovich does not teach or suggest assigning weights based on an average distance of subnets in an area to a particular area border router (ABR) of the area as recited in Claims 7, 12 and 17 but teaches assigning weights for each individual link. Accordingly, the cited combination of Hsu and Rabinovich does not teach or suggest each element of independent Claims 7, 12 and 17 and Claims dependent thereon.

Regarding independent Claims 10, 15 and 20, the Examiner cites Rabinovich to teach employing a search heuristic to assign weights for OSPF aggregates. (See Examiner's Action, pages 3, 9 and 10.) Rabinovich does not teach or suggest, however, selecting OSPF aggregate weights for a particular area including employing a search heuristic to assign weights for the OSPF aggregates as recited in independent Claims 10, 15 and 20. On the contrary, Rabinovich simply discusses employing heuristics for replacing replica. (See column 10, lines 40-45.) Regarding assigning weights, Rabinovich teaches assigning a cost metric for each individual link in an area. Rabinovich, therefore, does not teach or provide any suggestion of selecting OSPF aggregate weights for a particular area including employing a search heuristic to assign weights for the OSPF aggregates but instead teaches assigning cost metrics for each individual links in an area. Rabinovich, therefore, discloses an alternative to assigning weights versus employing a search heuristic. Accordingly, the cited combination of Hsu and Rabinovich does not teach or suggest each element of independent Claims 10, 15 and 20 and Claims dependent thereon.

In summary, the cited combination of Hsu and Rabinovich does not teach or suggest each element of independent Claims 7, 10, 12, 15, 17 and 20. Thus, the cited combination does not provide a *prima facie* case of obviousness for Claims 7, 10, 12, 15, 17 and 20 and Claims dependent

thereon. The Applicants, therefore, respectfully request the Examiner to withdraw the §103(a) rejection of Claims 7-21 and allow issuance thereof.

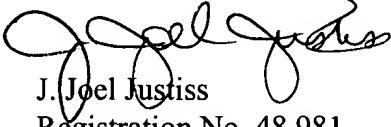
### III. Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-21.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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